

1 **DECONCINI McDONALD YETWIN & LACY, P.C.**

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10 Attorneys for Debtor

11 UNITED STATES BANKRUPTCY COURT

12 IN AND FOR THE DISTRICT OF ARIZONA

13 In Re:

14 ROCHELLE J. ROJAS

15 Debtor

In Proceedings Under Chapter 11

Case No. 2:10-bk-03070-SSC

**MOTION TO COMPEL ABANDONMENT
OF INTEREST IN LIMITED LIABILITY
COMPANY**

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18 Rochelle J. Rojas, the Debtor and Debtor-In-Possession in this case ("Debtor"), by and
19 through Counsel undersigned, moves this Court to Compel the Abandonment of the Estate's
20 interest, in Black Paw Management, LLC, an Arizona limited liability company ("Black Paw").

21 In support of this Motion, Debtor represents as follows:

22 1. Debtor filed for relief under Chapter 11 of the Bankruptcy Code on February 5,
23 2010. Debtor filed a petition for relief under Chapter 11 of the Bankruptcy Code on February
24 5, 2010. No Trustee has been appointed to administer the Debtor's Estate and the Debtor is
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1 acting as Debtor-In-Possession of her assets and in the management of her business
2 pursuant to 11 U.S.C. §§ 1107(a) and 1108.

3 2. This Court has jurisdiction over the parties and this case pursuant to 28 U.S.C.
4 §§157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. §157(b) (2) (A).
5 Venue is proper in this district pursuant to 28 U.S.C. § 1409(a).
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7 3. Debtor's business consists primarily of the ownership and management of
8 single and multi-family rental properties and one retail property, the majority of which are
9 located within in the greater Phoenix area.

10 4. In Schedule B of her Schedules and Statement of Affairs, Debtor listed Black
11 Paw Management, LLC (Black Paw") as her management company.
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13 5. Debtors seek abandonment of the Estate's interest in this company.

14 6. The value of the company is \$0.00, which is less than the amount of the total of
15 the debts owed by the company and is therefore of inconsequential value to the estate.

16 WHEREFORE, the Debtor respectfully requests that the Court enter an Order
17 compelling the Estate to abandon any interest in Black Paw.

18 RESPECTFULLY SUBMITTED this 26th day of March, 2010,
19

20 **DECONCINI MCDONALD YETWIN & LACY, P.C.**

21 /s/ Lawrence D. Hirsch, #004982

22 Lawrence D. Hirsch

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1 Notice of the foregoing was transmitted
2 this 26th day of March, 2010, to:

3 Mailing Matrix

4 By: /s/ Linda Miernik

5 Legal Assistant to Lawrence D. Hirsch

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